

Gary M. Hoffman (*Pro Hac Vice*)
Kenneth W. Brothers(*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
2101 L Street, NW
Washington, DC 20037-1526
Phone (202) 785-9700
Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
1177 Avenue of the Americas
New York, New York 10036-2714
Phone (212) 835-1400
Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715
Jonathan Weissglass, State Bar No. 185008
ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAINE
177 Post Street, Suite 300
San Francisco, California 94108
Phone (415) 421-7151
Fax (415) 362-8064

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICOH COMPANY, LTD.,)	CASE NO. CV 03-4669-MJJ (EMC)
)	
Plaintiff,)	DISCOVERY MOTION
)	
vs.)	DECLARATION OF MICHAEL A.
)	WEINSTEIN IN SUPPORT OF RICOH'S
AEROFLEX INCORPORATED, et al.,)	NOTICE OF MOTION AND MOTION TO
)	COMPEL AGAINST MATROX
Defendants.)	DEFENDANTS
)	
)	Date: TBD
)	Time: TBD
)	Courtroom: C

1 Michael A. Weinstein declares as follows:

2 1. My name is Michael A. Weinstein, an attorney with the law firm of Dickstein, Shapiro,
3 Morin & Oshinsky, LLP, counsel for Ricoh Company Limited. I am over the age of 21 and am
4 competent to make this declaration. Based on my personal knowledge and information, I hereby declare
5 to all the facts in this declaration.

6 2. Product level documents are necessary for Ricoh's expert to analyze the accused ASIC
7 and document its infringement claims.

8 3. The parties has previously stipulated that motions with respect to the newly disclosed
9 chips and depositions need be filed by June 15; earlier this week, the parties agreed to extend this by one
10 day to June 16.

11 4. Ex. 1 is a true and correct copy of the rough Deposition transcript of Eric Boisvert, dated
12 June 6, 2006 (Filed Under Seal).

13 5. Ex. 2 is a true and correct copy of the rough Deposition transcript of David Chaippini,
14 dated June 7, 2006 (Filed Under Seal).

15 6. Attached hereto as Ex. 3 is a true and correct copy of the Declaration of David
16 Chiappinni of Matrox Graphics in Support of Defendant's stipulation to Representative Products, dated
17 August 15, 2005.

18 7. Attached hereto as Ex. 4 is a true and correct copy of the Supplemental Product
19 Declaration of David Chiappinni of Matrox Graphics, dated October 13, 2005.

20 8. Attached hereto as Ex. 5 is a true and correct copy of the Second Supplemental Product
21 Declaration of David Chiappinni of Matrox Graphics, dated May 9, 2006.

22 9. Attached hereto as Ex. 6 is a true and correct copy of the Supplemental Product
23 Declaration of David Chiappinni for Matrox Tech, dated October 13, 2005.

24 10. Attached hereto as Ex. 7 is a true and correct copy of an Email from D. Demory to
25 K.Brothers dated February 13, 2006.

26 11. The 'product package' documents are necessary for Ricoh's expert to analyze the accused
27 ASIC and document its infringement claims.

1 12. To date, Ricoh has not received the required and requested technical information
2 regarding the Maven Chip.

3 13. To date, Ricoh has not received the required and requested technical information
4 regarding the Rainbow Runner Chip.

5 14. The parties agreed to extend the deadline to file motions to compel by one day to June 16,
6 2006.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Signed at Washington, D.C. on June 16, 2006.

9
10 June 16, 2005

/s/ Michael A. Weinstein
Michael A. Weinstein

Exhibit 1

**Exhibit 1 to
Weinstein Declaration
Filed Under Seal**

Exhibit 2

**Exhibit 2 to
Weinstein Declaration
Filed Under Seal**

Exhibit 3

1 Teresa M. Corbin (SBN 132360)
Christopher Kelley (SBN 166608)
2 Jaclyn C. Fink (SBN 217913)
HOWREY LLP
3 525 Market Street, Suite 3600
San Francisco, California 94105
4 Telephone: (415) 848-4900
Facsimile: (415) 848-4999

5 Attorneys for Plaintiff SYNOPSISYS, INC.
6 and for Defendants AEROFLEX INCORPORATED,
AMI SEMICONDUCTOR, INC., MATROX
7 ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX INTERNATIONAL
8 CORP., MATROX TECH, INC., and
AEROFLEX COLORADO SPRINGS, INC.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 RICOH COMPANY, LTD.,
14 Plaintiff,

15 vs.

16 AEROFLEX INCORPORATED, AMI
17 SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS LTD., MATROX
18 GRAPHICS INC., MATROX
INTERNATIONAL CORP., MATROX TECH,
19 INC., AND AEROFLEX COLORADO
SPRINGS, INC.

20 Defendants.
21

22 SYNOPSISYS, INC.,

23 Plaintiff,

24 vs.

25 RICOH COMPANY, LTD.,

26 Defendant.
27
28

) Case No. C03-04669 MJJ (EMC)

) Case No. C03-2289 MJJ (EMC)

) **DECLARATION OF DAVID CHIAPPINI OF**
) **MATROX GRAPHICS IN SUPPORT OF**
) **DEFENDANTS' STIPULATION TO**
) **REPRESENTATIVE PRODUCTS**



1 I, David Chiappini, declare as follows:

2 1. I am the ASIC Project Director of Matrox Graphics Inc. ("Matrox Graphics"). I have
3 been an employee of Graphics since June 1996, and I am familiar with our operations and facilities
4 from February 1997 to the present. I make this Declaration of my personal knowledge, and if called as
5 a witness, I could and would testify competently to the statements contained herein.

6 2. Engineers at Matrox Graphics design application specific integrated circuits (ASICs).
7 In designing ASICs, our engineers use various types of libraries in association with the Design
8 Compiler® software from Synopsys.

9 3. Since February 1997, we have used Design Compiler for logic synthesis of the
10 following commercial products, using the specified technology libraries:

#	PRODUCT	DESCRIPTION	LIBRARY
1	Cyclone	Graphics processing unit	NEC 0.5um
2	Mistral	Graphics processing unit	NEC 0.35um
3	Eclipse	Graphics processing unit	NEC 0.35um
4	EclipsePCI	Graphics processing unit	NEC 0.35um
5	Calao	Graphics processing unit	NEC 0.25um
6	Toucan	Graphics processing unit	NEC 0.25um
7	Maven	Video co-processing unit	NEC 0.25um
8	Condor	Graphics processing unit	UMC 0.18um
9	Condor Plus	Graphics processing unit	UMC 0.18um
10	Parhelia	Graphics processing unit	UMC 0.15um
11	Sundog	Graphics processing unit	UMC 0.15um
12	Parhelia8x	Graphics processing unit	UMC 0.15um
13	Sunex	Graphics processing unit	UMC 0.15um

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. This declaration was executed in Dorval, Quebec on August 15, 2005.

23 FOR David Chiappini further to his
24 acceptance and in his absence
David Chiappini

25 *[Signature]*
26 Nathalie Lizalle
27 Senior Legal Counsel
28 M.E.S.

Exhibit 4

1 Teresa M. Corbin (SBN 132360)
2 Denise M. De Mory (SBN 168076)
3 Jaclyn C. Fink (SBN 217913)
4 HOWREY LLP
5 525 Market Street, Suite 3600
6 San Francisco, California 94105
7 Telephone: (415) 848-4900
8 Facsimile: (415) 848-4999
9

10 Attorneys for Plaintiff SYNOPSIS, INC.
11 and for Defendants AEROFLEX INCORPORATED,
12 AMI SEMICONDUCTOR, INC., MATROX
13 ELECTRONIC SYSTEMS, LTD., MATROX
14 GRAPHICS, INC., MATROX INTERNATIONAL
15 CORP., MATROX TECH, INC., and
16 AEROFLEX COLORADO SPRINGS, INC.
17

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION
21

22 RICOH COMPANY, LTD.,

23 Plaintiff,

24 vs.

25 AEROFLEX INCORPORATED, AMI
26 SEMICONDUCTOR, INC., MATROX
27 ELECTRONIC SYSTEMS LTD., MATROX
28 GRAPHICS INC., MATROX
INTERNATIONAL CORP., MATROX TECH,
INC., AND AEROFLEX COLORADO
SPRINGS, INC.

Defendants.

SYNOPSIS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

) Case No. C03-04669 MJJ (EMC)

) Case No. C03-2289 MJJ (EMC)

) **SUPPLEMENTAL PRODUCT**
) **DECLARATION OF DAVID CHIAPPINI OF**
) **MATROX GRAPHICS**

1 I, David Chiappini, declare as follows:

2 1. I am the ASIC Project Director of Matrox Graphics Inc. ("Matrox Graphics"). I have
3 been an employee of Graphics since June 1996, and I am familiar with our operations and facilities
4 from February 1997 to the present. I make this Declaration of my personal knowledge, and if called as
5 a witness, I could and would testify competently to the statements contained herein.

6 2. Engineers at Matrox Graphics design application specific integrated circuits (ASICs).
7 In designing ASICs, our engineers use various types of libraries in association with the Design
8 Compiler® software from Synopsys.

9 3. Since February 1997, we have used Design Compiler for logic synthesis of the
10 following commercial products, using the specified technology libraries:

#	PRODUCT	DESCRIPTION	LIBRARY	SYNTHESIZED IN US
1	Cyclone	Graphics processing unit	NEC 0.5um	No
2	Eclipse	Graphics processing unit	NEC 0.35um	No
3	EclipsePCI	Graphics processing unit	NEC 0.35um	No
4	Calao	Graphics processing unit	NEC 0.25um	No
5	Toucan	Graphics processing unit	NEC 0.25um	No
6	Condor	Graphics processing unit	UMC 0.18um	No
7	Condor Plus	Graphics processing unit	UMC 0.18um	No
8	Parhelia	Graphics processing unit	UMC 0.15um	Yes
9	Sundog	Graphics processing unit	UMC 0.15um	Yes
10	Parhelia8x	Graphics processing unit	UMC 0.15um	Yes
11	Sunex	Graphics processing unit	UMC 0.15um	No
12	G200e	Soft IP	NEC .13um?	No
13	G200eUMA	Soft IP	NEC .13um?	No

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was executed in Dorval, Quebec on October 13, 2005.

**HOWREY
LLP** Case Nos. C03-4669 MJJ (EMC) and C03-2289 MJJ (EMC)
SUPPLEMENTAL MATRX GRAPHICS CHIAPPINI PRODUCT
DECL
DM US8259378.v1

Exhibit 5

Teresa M. Corbin (SBN 132360)
 Denise M. De Mory (SBN 168076)
 Jaclyn C. Fink (SBN 217913)
 HOWREY LLP
 525 Market Street, Suite 3600
 San Francisco, California 94105
 Telephone: (415) 848-4900
 Facsimile: (415) 848-4999

Attorneys for Plaintiff SYNOPSYS, INC.
 and for Defendants AEROFLEX INCORPORATED,
 AMI SEMICONDUCTOR, INC., MATROX
 ELECTRONIC SYSTEMS, LTD., MATROX
 GRAPHICS, INC., MATROX INTERNATIONAL
 CORP., MATROX TECH, INC., and
 AEROFLEX COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INCORPORATED, AMI
 SEMICONDUCTOR, INC., MATROX
 ELECTRONIC SYSTEMS LTD., MATROX
 GRAPHICS INC., MATROX
 INTERNATIONAL CORP., MATROX TECH,
 INC., AND AEROFLEX COLORADO
 SPRINGS, INC.

Defendants.

) Case No. C03-04669 MJJ (EMC)

) Case No. C03-2289 MJJ (EMC)

) **SECOND SUPPLEMENTAL PRODUCT**
) **DECLARATION OF DAVID CHIAPPINI OF**
) **MATROX GRAPHICS**

SYNOPSYS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

1 I, David Chiappini, declare as follows:

2 1. I am the ASIC Project Director of Matrox Graphics Inc. ("Matrox Graphics"). I have
3 been an employee of Graphics since June 1996, and I am familiar with our operations and facilities
4 from February 1997 to the present. I make this Declaration of my personal knowledge, and if called as
5 a witness, I could and would testify competently to the statements contained herein.

6 2. Engineers at Matrox Graphics design application specific integrated circuits (ASICs).
7 In designing ASICs, our engineers use various types of libraries in association with the Design
8 Compiler® software from Synopsys.

9 3. We have used the following "Commercial ASICs" (using the specified technology
10 libraries as defined in the May 5, 2006 Amended Stipulation Re Supplemental Production In
11 Accordance With Judge Chen's April 20, 2006 Order and Order Thereon (Ex. A):

#	PRODUCT	DESCRIPTION	LIBRARY	SYNTHESIZED IN US
1	Cyclone	Graphics processing unit	NEC 0.5um	No
2	Eclipse	Graphics processing unit	NEC 0.35um	No
3	EclipsePCI	Graphics processing unit	NEC 0.35um	No
4	Calao	Graphics processing unit	NEC 0.25um	No
5	Toucan	Graphics processing unit	NEC 0.25um	No
6	Condor	Graphics processing unit	UMC 0.18um	No
7	Condor Plus	Graphics processing unit	UMC 0.18um	No
8	Parhelia	Graphics processing unit	UMC 0.15um	Yes
9	Sundog	Graphics processing unit	UMC 0.15um	Yes
10	Parhelia8x	Graphics processing unit	UMC 0.15um	Yes
11	Sunex	Graphics processing unit	UMC 0.15um	No
12	Maven	Video co-processing unit	NEC 0.25um	Synthesized by party not in suit located outside the US

4. The following product included on the original Declaration has been removed from the list above because, after further investigation, it was determined that it was synthesized prior to the damages period:

#	PRODUCT	DESCRIPTION	LIBRARY	REASON FOR REMOVAL
1	Mistral	Graphics processing unit	NEC 0.35um	Synthesized prior to damages period

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was executed in Dorval, Quebec on May 9, 2006.


David Chiappini

EXHIBIT A

1 Teresa M. Corbin (SBN 132360)
2 Denise M. De Mory (SBN 168076)
3 Jaclyn C. Fink (SBN 217913)
4 HOWREY LLP
5 525 Market Street, Suite 3600
6 San Francisco, California 94105
7 Telephone: (415) 848-4900
8 Facsimile: (415) 848-4999

9 Attorneys for Defendants AEROFLEX INCORPORATED,
10 AEROFLEX COLORADO SPRINGS, INC., AMI
11 SEMICONDUCTOR, INC., MATROX ELECTRONIC
12 SYSTEMS, LTD., MATROX GRAPHICS, INC., MATROX
13 INTERNATIONAL CORP., and MATROX TECH, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

17 RICOH COMPANY, LTD.,

18 Plaintiff,

19 vs.

20 AEROFLEX INCORPORATED, AMI
21 SEMICONDUCTOR, INC., MATROX
22 ELECTRONIC SYSTEMS LTD., MATROX
23 GRAPHICS INC., MATROX
24 INTERNATIONAL CORP., MATROX TECH,
25 INC., AND AEROFLEX COLORADO
26 SPRINGS, INC.,

27 Defendants.

Case No. C03-04669 MJJ (EMC)

**AMENDED STIPULATION AND ORDER
RE SUPPLEMENTAL PRODUCTION IN
ACCORDANCE WITH JUDGE CHEN'S
APRIL 20, 2006 ORDER ; ORDER THEREON**

28 **IT IS HEREBY STIPULATED AND AGREED** by and between Ricoh Company, Ltd.
29 ("Ricoh") and Aeroflex Incorporated, AMI Semiconductor, Inc., Matrox Electronics Systems, Ltd.,
30 Matrox Graphics Inc., Matrox International Corp., Matrox Tech., Inc. and Aeroflex Colorado Springs,
31 Inc. (the "Defendants") that:

32 1. A "Commercial ASIC" is any ASIC (as defined in U.S. Patent No. 4,922,432 at Col.
33 1:13-17) that was, between 1997 and the present, (1) synthesized using Design Compiler for which (2)
34 revenue was received and (3) one or more physical ASICs were manufactured (whether considered to

HOWREY LLP

1 be a prototype or not). To avoid any doubt, all three criteria must be met and all three criteria must
2 have occurred between 1997 and the present for an ASIC to qualify as a "Commercial ASIC."

3 2. Subject to the limitations set forth in the paragraphs below, the Defendants will identify
4 and produce documents relating to Commercial ASICs synthesized between 1997 and the present by
5 subsidiaries, including those ASICs for which synthesis was performed before acquisition of the
6 subsidiary or its assets, for any Commercial ASIC either synthesized in the United States or sold in the
7 United States, except that Commercial ASICs synthesized before an acquisition or asset purchase will
8 not be identified if the acquiring party did not obtain rights to the ASICs. The Defendants will identify
9 and produce documents, subject to the limitations set forth below, relating to Commercial ASICs
10 synthesized by third parties provided that the synthesis was done at the request, direction or control of
11 any named party.

12 3. For all newly identified products, Ricoh agrees to accept production of only "product
13 packages" and financial information. The "product package" for a newly identified Commercial ASIC
14 will include, to the extent it exists and is within the producing Defendant's possession, custody or
15 control, the (1) script(s), including DC setup files, (2) inputs, including RTL inputs,¹ (3) technology
16 library(ies), (4) log file(s) and (5) netlist(s) for the newly identified Commercial ASIC.

17 4. For all newly identified Commercial ASICs, the Defendants agree to produce financial
18 documents including sales and cost information to the extent such information exists and is within the
19 producing Defendant's possession, custody or control, with the following qualification: if all synthesis
20 was done in the United States, or the RTL or technology library was supplied from the United States,
21 or the netlist or mask data was shipped into the United States for manufacturing, then the producing
22 Defendant will produce worldwide sales information for the newly identified Commercial ASIC.
23 Otherwise, the producing Defendant will produce only information regarding sales in the United
24 States.

25
26
27 ¹ The Defendants shall determine whether any third party, non-Synopsys software (e.g., a flowchart translator) was used to
28 convert an input specification to RTL. If so, the Defendants shall identify such third party software and produce the input
specification and the converted RTL.

1 5. The Defendants will update their product declarations and library declarations (to the
2 extent such updates are called for by newly identified ASICs) by May 10.

3 6. The Defendants will make good faith efforts to produce all documents by May 15. The
4 product packages will be produced in an electronically searchable format. The financial documents
5 will be produced in bates labeled and a native electronic format, to the extent such format exists.

6 7. To the extent that a particular Defendant does not have a complete product package or
7 financial information for a newly identified ASIC, the Defendant will inform Ricoh that it does not
8 have such information. To the extent the Defendant knows if such information is in the possession,
9 custody, and control of a third party, it will identify such third party. To the extent that responsive
10 information is the possession, custody or control of third parties known to the Defendants, the
11 Defendants will cooperate in good faith in assisting Ricoh to obtain such information by requesting
12 that the third party provide such information to it. Ricoh, however, understands that the Defendants'
13 obligations under this Stipulation are limited to making good faith requests.

14 8. The Defendants will make good faith efforts to provide additional 30(b)(6) deponents
15 before June 9. The Defendants will work in good faith to try to schedule depositions such that all or
16 most of the 30(b)(6) deponents are produced in one location in a one week period.

17 9. This Stipulation resolves the issues raised by Ricoh's Motion for Sanctions filed on
18 February 21, 2006. If the Defendants fail to perform in accordance with any of the terms of this
19 Stipulation, Ricoh reserves the right to seek evidentiary, monetary, or other sanctions.

20 10. To the extent that new Commercial ASICs are identified, Ricoh and the Defendants
21 agree that Ricoh's Final Infringement Contentions served on March 24, 2006 shall, in substantial part,
22 satisfy Ricoh's obligations to produce Final Infringement Contentions with regard to the newly
23 identified Commercial ASICs. Ricoh, however, shall supplement its Final Infringement Contentions
24 for each newly identified Commercial ASIC by identifying only the inputs that satisfy the following
25 elements of claim 13: "storing data describing a set of available integrated circuit hardware cells for
26 performing the actions and conditions defined in the stored set" and "describing for a proposed
27 application specific integrated circuit a series of architecture independent actions and conditions." To
28 the extent that the Defendants produced declarations, documents, and deponents as set forth above,

1 Ricoh will provide this supplement on or before June 19, 2006. In the event that the above deadlines
2 are not met, the parties will meet and confer in good faith regarding an appropriate time for
3 supplementation.

4 Dated: May 5, 2006

HOWREY LLP

5
6 By: /s/ Denise M. De Mory
7 Attorneys for Defendants AEROFLEX
8 INCORPORATED,
9 AEROFLEX COLORADO SPRINGS, INC., AMI
10 SEMICONDUCTOR, INC., MATROX ELECTRONIC
SYSTEMS, LTD., MATROX GRAPHICS INC.,
MATROX INTERNATIONAL CORP. and MATROX
TECH, INC.

11 Dated: May 5, 2006

DICKSTEIN SHAPIRO MORIN & OSHINSKY, LLP

12
13 By: /s/ Kenneth W. Brothers
14 Kenneth W. Brothers (*pro hac vice*)

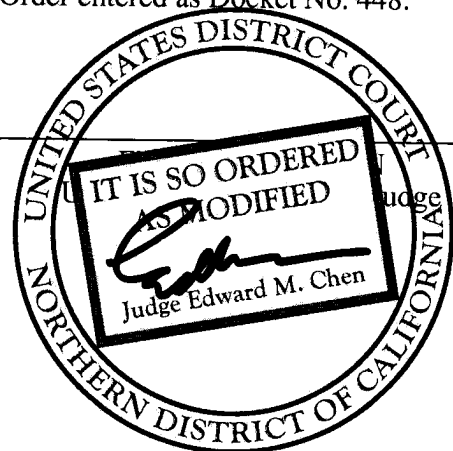
15 ALTSHULER, BERZON NUSSBAUM, RUBIN &
16 DEMAIN
Jeffrey B. Demain
17 Attorneys for Plaintiff and Defendant
RICOH COMPANY, LTD.

18 **ORDER**

19 Pursuant to stipulation, it is so ordered. ~~The continued hearing on Ricoh's Motion for~~
20 ~~Sanctions set for May 3, 2006 is hereby vacated.~~

21 This order ~~terminates Docket No. 358.~~ modifies the Order entered as Docket No. 448.

22 DATED: May 8, 2006 _____



HOWREY LLP

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.:
 COUNTY OF SAN FRANCISCO)

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is 525 Market Street, Suite 3600, San Francisco, California 94105.

On May 10, 2006 I served on the interested parties in said action the within:

SECOND SUPPLEMENTAL PRODUCT DECLARATION OF DAVID CHIAPPINI OF MATROX GRAPHICS

by causing said document to be sent by Electronic Mail on May 10, 2006 to the email addresses indicated for the parties listed below and by placing a true copy thereof in a sealed envelope(s) addressed as stated below and causing such envelope(s) to be delivered as follows:

Gary M. Hoffman, Esq.
HoffmanG@dsmo.com
 Dickstein Shapiro Morin & Oshinsky, LLP
 2101 L Street, N.W.
 Washington, DC 20037-1526

Jeffrey Demain, Esq.
jdemain@altshulerberzon.com
 Altshuler, Berzon, Nussbaum, Rubin & Demain
 177 Post Street, Suite 300
 San Francisco, CA 94108

Facsimile No.: (202) 887-0689

Facsimile No.: (415) 362-8064

Edward A. Meilman, Esq.
MeilmanE@dsmo.com
 Dickstein Shapiro Morin & Oshinsky, LLP
 1177 Avenue of the Americas
 New York, NY 10036-2714

Facsimile No.: (212) 896-5471

☒ (OVERNIGHT DELIVERY) on May 10, 2006 by depositing in a box or other facility regularly maintained by Federal Express, an express service carrier, or delivering to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document in sealed envelopes or packages designated by the express service carrier, addressed as stated above, with fees for overnight delivery paid or provided for and causing such envelope(s) to be delivered by said express service carrier on.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction the service was made and that the foregoing is true and correct.

Executed on May 10, 2006, at San Francisco, California.

Peter L. Kasenenko
 (Type or print name)

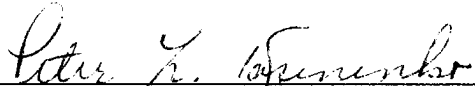

 (Signature)

Exhibit 6

1 Teresa M. Corbin (SBN 132360)
Denise M. De Mory (SBN 168076)
2 Jaclyn C. Fink (SBN 217913)
HOWREY LLP
3 525 Market Street, Suite 3600
San Francisco, California 94105
4 Telephone: (415) 848-4900
Facsimile: (415) 848-4999
5

Attorneys for Plaintiff SYNOPSYS, INC.
6 and for Defendants AEROFLEX INCORPORATED,
AMI SEMICONDUCTOR, INC., MATROX
7 ELECTRONIC SYSTEMS, LTD., MATROX
GRAPHICS, INC., MATROX INTERNATIONAL
8 CORP., MATROX TECH, INC., and
AEROFLEX COLORADO SPRINGS, INC.
9

10 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 RICOH COMPANY, LTD.,
14

Plaintiff,
15

vs.
16

AEROFLEX INCORPORATED, AMI
17 SEMICONDUCTOR, INC., MATROX
ELECTRONIC SYSTEMS LTD., MATROX
18 GRAPHICS INC., MATROX
INTERNATIONAL CORP., MATROX TECH,
19 INC., AND AEROFLEX COLORADO
SPRINGS, INC.
20

Defendants.
21

SYNOPSYS, INC.,
22

Plaintiff,
23

vs.
24

RICOH COMPANY, LTD.,
25

Defendant.
26
27
28

) Case No. C03-04669 MJJ (EMC)

) Case No. C03-2289 MJJ (EMC)

) **SUPPLEMENTAL PRODUCT
DECLARATION OF DAVID CHIAPPINI
FOR MATROX TECH**

1 I, David Chiappini, declare as follows:

2 1. I am the ASIC Project Director of Matrox Graphics Inc. ("Matrox Graphics"). I have
3 been an employee of Graphics since June 1996, and I am familiar with our operations and facilities
4 from February 1997 to the present. I make this Declaration of my personal knowledge, and if called as
5 a witness, I could and would testify competently to the statements contained herein.

6 2. I have worked closely with the design office of Matrox Tech, as well as supervised
7 some of the projects at Matrox Tech. Moreover, the realized projects at Matrox Tech are derived from
8 projects that were realized at Matrox Graphics, and therefore I am familiar with the methodology used
9 at Matrox Tech.

10 3. Engineers at Matrox Tech design application specific integrated circuits (ASICs). In
11 designing ASICs, our engineers use various types of libraries in association with the Design
12 Compiler® software from Synopsys.

13 4. Since February 1997, we have used Design Compiler for logic synthesis of the
14 following commercial products, using the specified technology libraries:

#	PRODUCT	DESCRIPTION	LIBRARY	SYNTHESIZED IN U.S.
1	Rainbow Runner	Video co-processing unit	NEC 0.35um	Yes
2	Twister	Graphics processing unit	NEC 0.35um	Yes
3	Parhelia	Graphics processing unit	UMC 0.15um	Yes
4	Sundog	Graphics processing unit	UMC 0.15um	Yes
5	Parhelia8x	Graphics processing unit	UMC 0.15um	Yes

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct. This declaration was executed in Dorval, Quebec on October 13, 2005.

22
23
24 
David Chiappini

Exhibit 7

From: DeMory, Denise
Sent: Monday, February 13, 2006 10:22 AM
To: 'seuttera@dsmo.com'; 'brotherk@dsmo.com'
Cc: Soccol, Jason
Subject: RE: Ricoh/Synopsys et al.: Replacement disks & Materials to Stratify

Ken:

As you know, Alan has made some requests to us recently, which are set forth below.

As you have been advised at least twice before, there is no data for Rainbow Runner.

You are now requesting bates labeled copies of the native log files we are delivering to Stratify. Unless you convince me otherwise, I am unwilling to do this as it seems highly inefficient. If we want them labeled, let's just have Stratify label what you want. Is there any reason to do it differently? And, why is it necessary to send a set of native disks to you and to Stratify? I am very concerned about having multiple, unlabeled copies of this data floating around.

Finally, please remind me of the bates number of the Matrox EULA that needs to be produced in a clearer form? And, finally, if you are going to call off the non-technical Matrox depositions for this week, I need to know soon.

Regards,

Denise

From: Seutter, Alan [mailto:SeutterA@dsmo.com]
Sent: Saturday, February 11, 2006 2:41 PM
To: Soccol, Jason

6/16/2006

Cc: _Brothers, Kenneth; DeLuca, Jerome; Barbisch, Rebecca
Subject: Ricoh/Synopsys et al.: Replacement disks & Materials to Stratify

Hi Jason,

Regarding my email below, **MT 302094** should be **MES 302094**.

Also, from the January 20th production, **MT 465593 - Native Rainbow Runner** has one folder titled rainbow_runner & five subfolders that are all empty. Are the contents of this disk correct? If not, please produce a replacement disk as well as the other requested replacement disks of corrupt data as soon as possible.

For all future productions other than native email, please produce bates numbered materials directly to us. Our original agreement was only native email was to be delivered directly to Stratify from Howrey.

Sincerely,

Alan Seutter
Paralegal
Dickstein Shapiro Morin & Oshinsky LLP
202-572-2685 SeutterA@dsmo.com

From: Seutter, Alan
Sent: Friday, February 10, 2006 5:03 PM
To: Jason J. Soccol (soccolj@howrey.com)
Cc: DeLuca, Jerome; Barbisch, Rebecca; 'Marie Vida'; Seyoum, Solomon; McGreevy, P. Tyler
Subject: Replacement disks & AF log file disks

Jason,

From Howrey's Jan 20, 2006 production, the following disks were found to be corrupt and had unreadable files:

- **MT 465592** **Native Parhelia8x**
- **MT 465594** **Native Sundog**
- **MT 302094** **Native Oasis**
- **4AMI 13136** **Native 15088-501**
- **4AMI 13145** **Native 19320-001**

Please produce replacement disks to us as well as to Marie Vida's attention at Stratify as soon as possible.

Regarding the recent production of Aeroflex (AF) log file disks to Stratify, please also produce a bates numbered production of these disks to us as well.

Sincerely,

Alan Seutter
Paralegal
Dickstein Shapiro Morin & Oshinsky LLP
202-572-2685 SeutterA@dsmo.com

6/16/2006

This e-mail message and any attached files are confidential and are intended solely for the use of the addressee(s) named above. This communication may contain material protected by attorney-client, work product, or other privileges. If you are not the intended recipient or person responsible for delivering this confidential communication to the intended recipient, you have received this communication in error, and any review, use, dissemination, forwarding, printing, copying, or other distribution of this e-mail message and any attached files is strictly prohibited. Dickstein Shapiro reserves the right to monitor any communication that is created, received, or sent on its network. If you have received this confidential communication in error, please notify the sender immediately by reply e-mail message and permanently delete the original message.

To reply to our email administrator directly, send an email to postmaster@dsmo.com

Dickstein Shapiro Morin & Oshinsky LLP
<http://www.DicksteinShapiro.com>

This email and any attachments contain information from the law firm of Howrey LLP, which may be confidential. The information is intended to be for the use of the individual or entity named on this email. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this email is strictly prohibited. If you receive this email in error, please notify us by reply email immediately so that we can arrange for the retrieval and deletion of this email and any attachments. Thank you for your cooperation.